

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
**IN RE: METHYL TERTIARY BUTYL ETHER
PRODUCTS LIABILITY LITIGATION**
-----X

**Master File C.A. No. 1:00-1898
MDL 1358 (SAS)
M21-88**

This document relates to the following cases:

City of New York
v. Amerada Hess Corp., et al., 04 Civ. 3417

-----X
**DEFENDANTS' NOTICE OF JOINT MOTION AND MOTION *IN LIMINE*
TO EXCLUDE EVIDENCE OF PROTECTED LOBBYING CONDUCT**

PLEASE TAKE NOTICE that on May 11, 2009, at the United States Courthouse at 500 Pearl Street, New York, New York, moving Defendants move to preclude Plaintiff City of New York ("Plaintiff") from introducing evidence of Defendants' protected lobbying conduct related to MTBE. In support of their Motion, Defendants rely upon the accompanying Memorandum of Law and all prior proceedings and pleadings.

Dated: May 11, 2009

BLANK ROME LLP

/s/ Jeffrey S. Moller
Alan J. Hoffman
Jeffrey S. Moller
Beth L. Haas
The Chrysler Building
405 Lexington Avenue
New York, New York 10174
(212) 885-5000
*Attorneys for Defendants,
Lyondell Chemical Company and
Equistar Chemicals, LP*